

REMARKS

With the present Amendment, Applicants address the rejections of the Office Action mailed September 7, 2005. Favorable reconsideration of this patent application, as presently amended and in light of the following discussion, is respectfully requested.

Independent claim 29 and dependent claims 30-35 and 40-44 stand rejected under 35 U.S.C. §102(e) as being anticipated by Ludwig (USPN 6,816,904).

Independent claims 1-10, 13-28, 36-39 and 61-62 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ludwig in view of Blumel (USPN 6,859,610).

Claims 11 and 12 were cancelled in a previous amendment. Claim 3 and 13 have been cancelled without prejudice with the present amendment.

Independent claims 1, 29 and 60 have been amended to more clearly recite the present invention. Further, the dependent claims have also been amended to further recite the novel features of the present invention and to correct grammatical errors.

Ludwig describes a networked video multimedia storage server environment where an audio/video server system (AVSS 100) interfaces with clients 40, 45 through A/V network manager 34. As noted by the Examiner, the A/V network manager 34 provides an API through which client applications may initiate A/V services. However, neither Ludwig nor Blumel, either alone or in combination, suggest an application program interface layer between a controller (or two controllers) and the storage layer. In the Ludwig system, an audio video server manager 160 coordinates activity with separate storage systems 120 but the interface is a network interface and not an API. There is no suggestion in either reference that the audio/video filing system should include an application program interface that handles different types of file data differently at the audio/video filing system level.

Since claims 1, 29 and 61, as now amended, each distinctly claim the novel features of the present invention, each independent claim is now believed to be in allowable condition. Further, dependent claims 2-10, 13-28, 29-60 and 62, which depend from the independent claims, are also believed to be in allowable condition.

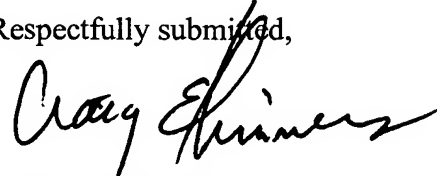
Applicants respectfully submits that all pending claims particularly point out and distinctly claim the subject matter that Applicants regard as their invention.

Reconsideration of the rejections is respectfully requested. Allowance of the pending claims, as now amended, at an early date is earnestly solicited.

If an extension of time to reply to the Office Action under 37 CFR 1.136(a) is required, Applicants hereby provisionally request such additional extension. Any additional charges for this extension of time may be charged to Deposit Account No. 503000.

December 7, 2005

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Craig E. Shinnars", written in a cursive style.

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